

DIVISIONAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Spartanburg County
John C. Hayes, III, Circuit Court Judge

S.C. Supreme Court

THE STATE,

RESPONDENT,

V.

JEFFERSON PERRY,

PETITIONER.

APPELLATE CASE NO. 2012-211430

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a one-time and final ten (10) day extension, **until December 4, 2014**, pursuant to this Court's order of July 16, 2014 in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. The good cause is counsel is working on and will be filing the United States certiorari petition in the case of Bayan Aleksey v. State of South Carolina today, November 24, 2014.

3. Counsel filed the petition for writ of certiorari in the case of Richard Keith Poe v. State of South Carolina with this Court on November 21, 2014. Counsel attended a PCR Hearing on November 18, 2014 in Richland County in the case of Quincy Jovan Allen v. The State. Counsel filed the petition for writ of certiorari in the case of Sammie Louis Stokes v. State of South Carolina (death penalty case) with this Court on November 12, 2014. Counsel gave a presentation that he continued to prepare for after doing the materials on the Fourth Amendment for the Summary Judge's Conference on November 7, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Bradley Gerald Mullins with the Court of Appeals on November 4, 2014. Counsel filed a petition for stay of execution in the case of The State v. Richard Moore with this Court on October 31, 2014. Counsel presented the Appellate Project CLE on October 30, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of The State v. Victor White with this Court on October 30, 2014. Counsel attended a PCR hearing on October 29, 2014 in Dorchester County in the case of Walter Lee Harris v. State of South Carolina. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of The State v. Tawanda Allen with this Court on October 27, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of Timothy D. Dingle v. The State (murder case) with the Court of Appeals on October 22, 2014. Counsel filed the petition for rehearing in the case of The State v Jason A. Bauman with the Court of Appeals on October 16, 2014. Counsel had an oral argument in the case of The State v. Christopher Heller before this Court on October 7, 2014. Counsel filed the final brief of petitioner in the case of Michael D. Hall v. State of South Carolina with co-counsel, Susan B. Hackett and David Alexander, with this Court on October 6, 2014. Counsel had an oral argument in the case of The State v. Antonio Miller before the Court of Appeals on October 6, 2014. Counsel filed the petition for rehearing in the case of The State v. Michael Anthony Rogers in the Court of Appeals on October 2, 2014. Counsel filed the petition for rehearing with

co-counsel, Susan Hackett, in the case of Richard Bernard Moore v. State of South Carolina with this Court on September 26, 2014. Counsel prepared for and presented his Case Law Update power-point presentation for the 2014 Annual Public Defender Conference held September 22-24, 2014 in Myrtle Beach, South Carolina.

4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first -- and obviously will adjust to the new extension order --- so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

5. Opposing counsel for the Attorney General's office, William M. Blich, Jr., kindly consents or does not oppose this request as shown by signature below.

WHEREFORE, for the above-mentioned reasons, and **as a showing of good cause**, the undersigned counsel would respectfully request a one-time and final ten-day extension, **until December 4, 2014**, in which to serve and file the petition for writ of certiorari and accompanying appendix. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



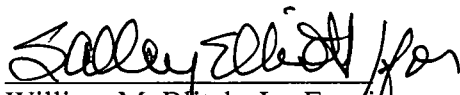
Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director/
J. Hugh Ryan, III
General Counsel

This 24th day of November, 2014.

I consent:


William M. Blitch, Jr., Esquire